



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

OFFICE OF RESEARCH AND DEVELOPMENT
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604

US EPA RECORDS CENTER REGION 5



482774

MEMORANDUM

SUBJECT: Draft Ecological Risk Assessment Methodology Review
East Troy Contaminated Aquifer Site
East Troy, OH

FROM: Charles G Maurice, PhD, Superfund & Technology Liaison
Office of Science Policy
Office of Research and Development

TO: Shari Kolak, Remedial Project Manager
Remedial Response Branch #1
Superfund Division

DATE: June 11, 2014

GENERAL COMMENT

As a "Draft Risk Assessment Methodology" document, little information was provided regarding the methods, or even general analysis approaches, which will be used for the ecological portion of the risk assessment.

SPECIFIC COMMENTS

Page 19, Paragraph 3:

1. How wetland discovery, confirmation, or rejection in the vicinity of the plume will be accomplished is not described. For example, will wetlands ecologists walk through the plume and adjacent areas; closely examine aerial photographs; access local information? Will all identified wetlands be included on maps?
2. Please clarify how wetlands west of the Greater Miami River (GMR) can be adjacent to the municipal golf course located east of the GMR.

Page 19, Paragraph 5:

3. Since the Ohio EPA rated GMR habitat above and immediately below the site to be good to high quality, how will the river reach receiving or potentially receiving site plume contaminants be assessed to resolve whether or not potential habitat discontinuity exists to justify proceeding to a baseline ecological risk assessment (BERA)?

Page 20, Paragraph 1 (Attachment A):

4. The meaning or reason for including 23 pages of material describing federally-listed threatened, endangered, proposed, and candidate species across the entirety of Ohio is unclear.
5. The duplicate page of state-listed species for Miami County should be removed.

6. The Miami County sum totals of 16 plant and 7 animal federal- and state-listed species do not appear to match the data provided on the associated pages of Attachment A and should be corrected.
7. As was provided for the federally-listed species, habitat information corresponding to the Miami County state-listed species would be relevant and helpful.
8. No statement was made regarding how the federally- and state-listed species compilations of Attachment A will be used. Will further inquiries regarding listed species presence or absence be conducted with federal, state, or local officials; evaluations of potential habitats corresponding to the county species lists be conducted?

Page 21, Paragraph 1:

9. A food chain model will only be requested if necessitated by discovery of site-related, potential bioaccumulative chemicals in addition to the expected volatile organic compounds (VOCs).